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Attorney for Defendant
CITY OF REDDING, GARRETT MAXWELL, AND
MATTHEW BRUCE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

VERONICA MCLEOD, individually and
as successor in interest to decedent,
DOLORES HERNANDEZ; AMADO
HERNANDEZ; individually and as
successor in interest to decedent,
DOLORES HERNANDEZ; and YSIDRA
REGALDO, individually,

Plaintiff,

v.

CITY OF REDDING; GARRETT
MAXWELL, an individual; MATTHEW
BRUCE, an individual; and DOES 2-10,
inclusive,

Defendants.

Case No. 2:22-cv-00585-WBS-JDP

**JOINT STIPULATION AND REQUEST FOR
ORDER TO MODIFY THE BRIEFING
SCHEDULE FOR DEFENDANTS' FILED
MOTION FOR SUMMARY JUDGMENT, OR
IN THE ALTERNATIVE, SUMMARY
ADJUDICATION AND PROPOSED ORDER**

Hon. WILLIAM B. SHUBB

Date: June 10, 2024
Time: 1:30 p.m.
Ctrm: 5

Trial: September 10, 2024

**TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF
RECORD:**

Plaintiffs VERONICA MCLEOD, individually and as successor in interest to decedent,
DOLORES HERNANDEZ; AMADO HERNANDEZ, individually and as successor in interest to
decedent, DOLORES HERNANDEZ; and YSIDRA REGALDO, individually ("Plaintiffs"), and
Defendants CITY OF REDDING, GARRETT MAXWELL, and MATTHEW BRUCE
("Defendants") (collectively "the Parties"), hereby submit this Stipulation and Request for Order
to Modify the Briefing Schedule for Defendants' Filed Motion for Summary Judgment, or in the

Alternative Summary Adjudication.

STATEMENT OF GOOD CAUSE

1. Defendants timely filed their Motion for Summary Judgment (or in the alternative, summary adjudication) pursuant to Rule 56 on April 24, 2024 (Dkt. No. 27 – “Motion for Summary Judgment”).

2. Pursuant to Local Rule 230(c) and (d) (and Rule (a)(1)(C)), Plaintiffs’ Opposition to Defendants’ Motion for Summary Judgment (Plaintiffs’ Opposition) is currently due on May 8, 2024, and Defendants’ Reply to Plaintiffs’ Opposition (“Defendants’ Reply”) is due on May 20, 2023.

3. Defense counsel (undersigned) has a pre-planned vacation from May 7, 2024, to May 14, 2024 and other non-case related pending motions, depositions, and hearings over the next two to three weeks. Accordingly, Defendants require additional time to prepare and file their Reply and are requesting an extension of the current filing deadline of May 20, 2023, for Defendants’ Reply.

4. The Parties have met and conferred and have come to an agreement to extend the current filing deadline of May 20, 2023, for Defendants’ Reply, to allow additional time to file Defendants’ Reply. In exchange, Defendants agree to also allow Plaintiffs additional time to file Plaintiffs’ Opposition and to extend the current filing deadline of May 8, 2023, for Plaintiffs’ Opposition.

5. Defense counsel has provided a sworn declaration attesting to these aforementioned facts and provided additional information in support of this Stipulation.

6. Accordingly, the Parties hereby stipulate that there is good cause and jointly request that the Court enter an order modifying the briefing schedule for Defendants’ Motion for Summary Judgment as follows:

Deadline to file Plaintiffs’ Opposition from **May 8, 2024, to May 13, 2024**

Deadline to file Defendants’ Reply from **May 20, 2024, to May 28, 2024.**

IT IS SO STIPULATED

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Respectfully submitted,

Dated: May 6, 2024

ALLEN, GLAESSNER,
HAZELWOOD & WERTH, LLP

By: /s/Ameet D. Patel
DALE L. ALLEN, JR.
AMEET D. PATEL
Attorneys for Defendants
CITY OF REDDING, GARRETT
MAXWELL, and MATTHEW BRUCE

Respectfully submitted,

Dated: May 3, 2024

LAW OFFICES OF DALE K. GALIPO

By: /s/Hang D. Le
DALE K. GALIPO
HANG D. LE
Attorneys for Plaintiffs

ALLEN, GLAESSNER, HAZELWOOD & WERTH, LLP
180 Montgomery Street, Suite 1200
San Francisco, California 94104

[PROPOSED] ORDER

Good cause appearing, the parties' Stipulation to Modify the Briefing Schedule for Defendants' Motion for Summary Judgment (Dkt. No. 27) is GRANTED, and the scheduling order is hereby modified as set forth in the stipulation.

IT IS SO ORDERED.

Dated: _____

HONORABLE WILLIAM B. SHUBB

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